MINTZ LEVIN

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Via Electronic Filing

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Ex Parte Communication, Docket Nos. 96-45, 04-36

Dear Secretary Dortch:

On Wednesday, October 10, 2007 Mark Flynn, General Counsel of iBasis, Inc. and Kemal Hawa and Michael Pryor of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. met with Dana Shaffer, Jeremy Marcus, and Nick Alexander of the Federal Communications Commission Wireline Bureau. The parties discussed the information provided in the attached presentation. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Kemal Hawa

Kemal Hawa Counsel to iBasis, Inc.

Enclosure

4164096v.1

The New iBasis



October 10, 2007



- iBasis recently concluded a transaction with Royal KPN, N.V.
 As a result of the transaction:
 - iBasis' global VoIP network is combined with KPN's wholesale international voice service, KPN Global Carrier Services.
 - iBasis is now one of the three largest carriers of international voice traffic in the world - essentially equal to AT&T and second only to Verizon.
 - iBasis and KPN Global Carrier Services collectively carried more than 20 billion minutes of international voice traffic in 2006.

 As a result of the transaction, the new iBasis will now serve approximately 1,000 wholesale customers including national operators, wholesale carriers, calling card operators, mobile operators, fixed retail business, cable Multi-Service Operators and Voice over Broadband service providers.



- iBasis was launched in 1996 to utilize the ubiquity of the public Internet and harness the efficiency of packet routing and universal IP protocol.
- iBasis never operated a circuit switched network. Instead, it deployed gateways that, where necessary, converted TDM traffic to IP protocol for termination in foreign destinations. iBasis' wholesale business conceptually is a trading business, matching buyers (carriers that need termination) with sellers (local carriers in foreign countries).



- iBasis' global VoIP network comprises over 1,000 points of presence in more than 100 countries and interconnects with more than 600 carriers worldwide.
- iBasis' wholesale customers include not only the largest carriers in the world, such as AT&T, Verizon, Telecom Italia, China Unicom, and Telefonica, but also major VoIP providers such as Skype and Yahoo. iBasis estimates that more than 10% of its international voice traffic originates or terminates over broadband connections.



iBasis' Retail Prepaid Calling Card Business 6

- iBasis began providing prepaid calling cards in 2003.
- The prepaid calling card service utilizes the same, efficient VoIP network that iBasis uses for its wholesale business.
- In 2004, iBasis started a web-based prepaid service called Pingo.
 - Pingo allows access in 35 countries to users buying calling time over the iBasis network using a credit card or PayPal account.
 - Features include auto-recharge and PIN-less dialing when calling from phones that the subscriber uses most often.



Universal Service & Other Fees and Surcharges 7

- iBasis supports efforts to reform the universal service contribution mechanism. If a revenue-based contribution methodology is retained, iBasis requests that the FCC consider the following:
 - Eliminate the requirement that prepaid calling card providers contribute based on the face value of the card. Prepaid calling card providers routinely sell these cards at a discount and thus pay on revenue that they do not actually receive.
 - Extend the Limited International Revenue Exemption (LIRE) to the Telecommunications Relay Services Fund.



- iBasis urges the FCC to address the regulatory classification of IP-enabled services.
- Regulation of information services such as the services that iBasis offers should remain subject to minimal regulation in order to continue to foster the development of competitive IPbased communications services.

